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ORDER # 94 RF 02646

EG&G ROCKY FLATS

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EG&G ROCKY FLATS, INC
ROCKY FLATS PLANT, P O BOX 464, GOLDEN COLORADO 80402 0464 • (303) 966 7000

March 3, 1994

94-RF-02646

F R Lockhart
Environmental Restoration Division
DOE/RFO

REQUEST FOR KEY DECISION 2 FOR THE OPERABLE UNIT 4 (OU 4) REMEDATION PHASE I PROJECT - SRK-042-94

This letter formally requests Key Decision #2 (KD2) for the OU4 Phase I Remediation project. The Enhanced Conceptual Design Report, as part of Interim Measures/Interim Remedial Actions Decision Document (IM/IRA DD) was issued for review on March 2, 1994. Comments will be received for a roundtable review on March 8, 1994, and any additional comments can be received no later than March 22, 1994 for inclusion in the Title II design.

In order to meet the aggressive Interagency Agreement (IAG) milestones and the construction acceleration strategy goals, Title I will not be performed. Accordingly, Title II design will need to start no later than March 16, 1994 in order to achieve our bias for action goals.

It is DOE general policy (DOE Order 4700 1, Part F) to complete the National Environmental Policy Act (NEPA) process prior to commencing detailed design. As a method for accomplishing significant acceleration of the "Start of Construction" milestone for Phase I Remediation during the dispute resolution process, Title II design was scheduled to commence on April 15, 1994. That date precedes the completion of the NEPA process by at least six months. This schedule was informally approved by you and your staff during the planning process. At that time, it was EG&G Rocky Flats, Inc., stated intention to secure formal DOE concurrence with the plan after its adoption. DOE committed to deliver that concurrence. As has been specifically stated in three letters previously transmitted to DOE/RFO (reference 93-RF-12846, 93-RF-14744, and 94-RF-00248), EG&G feels that concurrent design does not pose significant risk, but rather represents a productive initiative encouraged by the DOE. In the letters, EG&G has asked for DOE'S concurrence with this position and the direction to proceed. Please incorporate in the KD 2 approval the direction to proceed with Title II design prior to completion of the NEPA process.

Please obtain concurrence from your counterpart in DOE/RFP, PME, as appropriate, prior to approval of KD2 for this project.

CLASSIFICATION

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F R Lockhart
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The Program Manager is Andy Ledford at extension 8673 He can answer any questions you may have concerning this project

A R Keith

S R Keith
Director
Solar Pond Projects
EG&G Rocky Flats, Inc

DRE bep

Orig and 1 cc - F R Lockhart

cc
S Howard
M A Witherill